

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No.: 20-CV-954

FARHAD AZIMA,)
)
Plaintiff,)
)
vs.)
)
NICHOLAS DEL ROSSO and VITAL)
MANAGEMENT SERVICES, INC.,)
)
Defendants.)

DEPOSITION OF NICHOLAS DEL ROSSO

Volume I

Contains Confidential Testimony

2:07 P.M.

Monday, February 13, 2023

By: Lisa Taylor, RPR

A P P E A R A N C E S

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1 A. I know he's a lawyer working for
2 Azima.

3 Q. Have you ever spoken to him?

4 A. No.

5 Q. And what's your basis for saying he
6 offered a bribe?

7 A. He put it in writing. It's in a
8 document that he sent to Pandey.

9 Q. And does the document say, "I'm going
10 to give you a bribe if you don't -- if you do this"?

11 A. Not in that direct form, but in
12 offering to pay him however much it was, 300 and --
13 \$550 an hour for 30 hours a month. Or was it 30
14 hours a month? Yeah.

15 Q. So have you seen the report that was
16 prepared by Meta, which I think is the owner of
17 Facebook, regarding CyberRoot being a hacking
18 company?

19 MR. NEUMAN: Objection and lacks
20 foundation.

21 THE WITNESS: I'm not aware that --

22 BY MR. BEHRE:

23 Q. Are you aware that --

24 A. Let me just finish my answer.

25 Q. Sorry.

1 A. I'm not aware that CyberRoot is a
2 hacking company. I don't believe that to be the
3 case.

4 And -- I'm sorry. Who is Meta? Who's
5 Meta? Something about Meta?

6 Q. Meta, the owner of Facebook, has
7 kicked CyberRoot off of Facebook because it did an
8 internal investigation and reached a conclusion that
9 CyberRoot was a hacking company.

10 MR. NEUMAN: Lacks foundation and
11 calls for speculation. Scope.

12 THE WITNESS: I've not seen that, no.

13 BY MR. BEHRE:

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

C E R T I F I C A T E

I, Lisa Taylor, Registered Professional Reporter and notary public certify:

That the foregoing deposition of Nicholas Del Rosso was taken before me at the time and place therein set forth at which time the witness was put under oath by me;

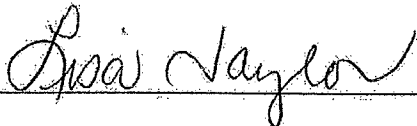
That the testimony of the witness and all objections made at the time of the deposition were recorded stenographically by me and thereafter transcribed;

That the foregoing deposition is a true record of the testimony and of all objections made at the time of the deposition.

I further certify that I am neither counsel for nor related to any party to said action, nor in any way interested in the outcome thereof.

My certification as to the accuracy of this transcript, if it has been reformatted or altered from its original form in any manner, is null and void.

In witness whereof, I have subscribed my name this 16th day of February 2023.



Lisa Taylor
Registered Professional Reporter
Notary Public